

**COSUMNES POWER PLANT
DATA ADEQUACY RESPONSES (01-AFC-19)**

Section 2.8 Visual Resources

Data Adequacy Deficiency – The map (Figure 8.11-1) is not at a scale of 1:24,000, as required. Please provide Figure 8.11-1 at a scale of 1:24,000.

Data Adequacy Response – A copy of Figure 8.11-1 at the appropriate scale has been attached at the end of this section.

Data Adequacy Deficiency – The AFC (p.8.11-7) states that KOP 3 is representative of the view from “several” residences. Please specify the number of residences or provide a numeric estimate of the number of residences.

Data Adequacy Response – There are approximately 5 to 10 residences on the ridgetops of hills to the west and south of the proposed project that are visible from Twin Cities Road and are in the vicinity of the KOP 3 residence. Although these other residences are located on hilltops, similar to the KOP 3 residence, their view of the proposed project is not as direct as is provided from KOP 3, and in fact, is obstructed to varying degrees. This is due to intervening topography, other structures, and vegetation. Only one other residence, located to the north of KOP 3 and to the west of the proposed project, is located on a hilltop and would have a relatively unobstructed view of the proposed project that is expected to be similar to the view from KOP 3.

Data Adequacy Deficiency – The AFC specifies the height of the HRSG stacks (p. 8.11-9 and Figure 2.2-2) and the transmission poles (p. 5-8 and Figures 5.3-4a and 5.3-4b). However, the AFC does not specify the diameter of the HRSG stacks or the transmission poles, or the dimensions of the other major visible components of the project. Please provide these dimensions.

Data Adequacy Response – The following table provides dimensions of the proposed CPP generating facility’s major features. Included in the table are the height, length, width, and diameter (all presented in feet) for the HRSG units, gas combustion turbines, steam turbine generator, pipe rack, cooling tower, tanks, various buildings, the switchyard, and ponds. The transmission pole diameters are shown on AFC Figures 5.3-4a and 4b. The poles are tapered, starting at 31.32 inches (face-to-face dimensions) at the base and ending at 12 inches at the top.

Dimensions of the CPP Generating Facility's Major Features

Feature	Height (feet)	Length (feet)	Width (feet)	Diameter (feet)
HRSG Units				
HRSG casings	72 ft.	120 ft.	32 ft.	
To platform	74 ft.			
To top of highest drums	97 ft.			
To top of top works support steel	75 ft.			
To top of highest relief valves and vent silencers	107 ft.			
HRSG stacks	160 ft.			18.5 ft.

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Dimensions of the CPP Generating Facility's Major Features

Feature	Height (feet)	Length (feet)	Width (feet)	Diameter (feet)
Gas Combustion Turbines				
Gas combustion turbines	36 ft.	160 ft.	30 ft.	
Gas turbine air inlet filters	65 ft.	85 ft.	40 ft.	--
Steam Turbine Generator				
STG enclosure	14 ft.	80 ft.	30 ft.	
STG pedestal	40 ft.	100 ft.	40 ft.	
Pipe Rack	40 ft.	200 ft. (Longest Section)	20 ft.	
Cooling Tower (9 cells/phase)				
To top of deck	37 ft.	48 ft.	66 ft.	(each cell)
To top of fan shrouds (cones)	43 ft.			36 ft
Tanks				
Raw Water Tanks	40 ft.	--	--	105 ft.
D.I. Water Storage Tanks	40 ft.	--	--	32 ft.
Administration Building	15 ft.	100 ft.	50 ft.	
Control Room	15 ft.	60 ft.	50 ft.	
Maintenance Building & Warehouse	18 ft.	200 ft.	80 ft.	
Electrical Building	15 ft.	66 ft.	60 ft.	
Water Treatment Building	23 ft.	120 ft.	50 ft.	
Fire Pump House	15 ft.	40 ft.	20	
Switchyard				
Switchyard Bus Structures	30 ft.			
Conductor Take-Off Structures	70 ft.	580 ft.	110 ft.	
Transmission Towers	100 to 125 ft			31.32" (base); 12" (top)
Ponds				
Stormwater Retention Pond	--	510 ft.	120 ft.	

Data Adequacy Deficiency – The AFC (Table 8.11-2) states that “the 160-foot stack height would require approval by the County” because it exceeds the 140-foot height limit. Please provide the schedule for obtaining County approval. Please also specify the steps the applicant has taken or plans to take to obtain such approval.

Data Adequacy Response – The most recent information we have on this issue is contained in an October 11, 2001, email from Rob Burness of the County Planning Department to Sandra Fromm (CEC Project Manager). In the email Mr. Burness stated:

I think that the County's zoning code provisions could require a variance to exceed the height limitations specified in the code if this were a matter under the normal jurisdiction of the County. The height limit for any structure in an agricultural zone is 40 feet, but there is an exception to this limit (section 301-21) for towers. The combined square footage of the base of the towers cannot be greater than 1600 feet. If it is, then the exception is not applicable. In that case, a variance from the 40 foot height requirement for institutional uses be necessary (section 320-04). My

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understanding is that the combined square footage of the base of the towers is greater than 1600 square feet.

Of course, CEC controls the regulatory process. I leave it to you as to whether you want to require the District to go through the variance process with the County. However, we are planning a fairly thorough local review process as described below, and we will have ample opportunity to get input on the height of the towers and provide input to the CEC.

We are planning to hold two sets of meetings to provide local input. The first will be a comment/issue gathering phase in conjunction with your completion of the adequacy phase. We have scheduled meetings with both Southeast and Franklin Laguna CPACs on November 8 and October 25 respectively to get input. We are planning on discussing the power plant at the Policy Planning Commission on November 14. The Policy Planning Commission will formally address the matter of consistency with the General Plan (State law requires this of special districts). The Board will consider the matter on December 5, after which we will formally transmit the County's comments to your Commission. Since you may be asking for some information/input before that time to comply with your 45 day period prior to CEC hearing, we will try to provide you with a department response and whatever input we have obtained at the aforementioned hearings in time to meet your review timeline. However, time constraints and holidays prevent us from moving up the timetable for the Board and Planning Commission hearings.

We plan to repeat this process again, after you have completed your staff analysis and prior to the final CEC hearings on the plant. This will provide an opportunity for appointed and elected local officials to offer their specific recommendations, with the opportunity for CPAC and neighborhood input, to the Energy Commission regarding the licensing of the Cosumnes Power Plant.

The Applicant plans to work closely with Sacramento County and the CEC staff to ensure any variances required will be obtained as soon as possible—hopefully by the end of this calendar year.

